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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MICHELLE PETERS,

Plaintiff,

vs.

CLARK COUNTY, a political subdivision of the
State of Nevada; DOES I-X.

Defendants

Case No.: 2:20-cv-01811-JAD-EJY

**STIPULATION AND ORDER TO
EXTEND DISPOSITIVE MOTION
DEADLINE AND TAKE DEPOSITION
AFTER DISCOVERY DEADLINE**

[FIRST REQUEST]

Pursuant to Local Rules 6-1 and 26-4, Defendant Clark County (“Defendant”) and Plaintiff Michelle Peters (“Plaintiff”), by and through their undersigned counsel, hereby stipulate to extend the current dispositive motion deadline from December 1, 2021 to January 3, 2022 and

1 to permit the FRCP Rule 30(b)(6) deposition of the Defendant to proceed and be completed after
2 the current discovery period ends on November 1, 2021. The Parties inform the court as follows:

- 3 1. On October 8, 2021 Plaintiff served her FRCP Rule 30(b)(6) notice on Defendant.

4 Upon the parties meeting and conferring on the topics it was learned that the date
5 that the deposition was noticed for was inconvenient due to Defense counsel's
6 schedule and that of the persons who will be testifying on behalf of the
7 Defendant;
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- 9 2. Due to calendar conflicts of counsel and the designated deponents, the first
10 available dates for the deposition to take place are November 4, 2021 for one
11 designee, and November 18, 2021 for the other two designees;

- 12 3. Accordingly, the Parties stipulate to extend the dispositive motion deadline from
13 December 1, 2021 through and including January 3, 2022 (approximately 30 days
14 given the date of the observed New Years holiday) and that the FRCP Rule
15 30(b)(6) deposition may be taken after the current November 1, 2021 close of
16 discovery;
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- 18 4. This extension is in good faith to accommodate the schedules of counsel and
19 witnesses and not for purposes of delay.
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Accordingly, the parties stipulate, subject to approval of this court, to the following new proposed deadlines:

Deadline	Current Deadline	Revised Deadline
Discovery Cut-off	November 1, 2021	December 1, 2021 (Def Depo)
Dispositive Motions	December 1, 2021	January 3, 2022
Joint Pretrial Order	January 3, 2022	February 2, 2022

Respectfully submitted,

Dated this 1st day of November, 2021,

Dated this 1st day of November, 2021,

/s/James P. Kemp
 JAMES P. KEMP, ESQ.
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/s/ Scott R. Davis
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 CLARK COUNTY DISTRICT ATTORNEY'S
 OFFICE
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ORDER

IT IS SO ORDERED.


 THE HONORABLE ELAYNA J. YOUCHAH
 UNITED STATES MAGISTRATE JUDGE

Dated: November 1, 2021.